

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

YELLOW CORPORATION, *et al.*,¹

Debtors.

)

) Chapter 11

)

) Case No. 23-11069 (CTG)

)

) (Jointly Administered)

)

) Re: Docket No. 5996

) Objection Deadline: April 11, 2025, at 4:00 p.m. E.T.

**NOTICE OF FILING OF SUPPLEMENTAL ORDER (I) APPROVING THE
ADEQUACY OF THE THIRD AMENDED DISCLOSURE STATEMENT,
(II) APPROVING SUPPLEMENTAL SOLICITATION AND VOTING
PROCEDURES, (III) APPROVING REVISED FORMS OF BALLOTS AND
NOTICES IN CONNECTION THEREWITH, (IV) APPROVING CERTAIN
DATES WITH RESPECT THERETO AND (V) GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE THAT:

1. On September 2, 2024, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed the *Joint Chapter 11 Plan of Yellow Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 4253] (the “Initial Plan”) and the *Disclosure Statement for the Joint Chapter 11 Plan of Yellow Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 4254] (the “Initial Disclosure Statement”) with the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”).

2. On October 17, 2024, the Debtors filed the *First Amended Joint Chapter 11 Plan of Yellow Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 4580] (the “First Amended Plan”) and the *First Amended Disclosure Statement for*

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of the Debtors’ principal place of business and the Debtors’ service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

the First Amended Joint Chapter 11 Plan of Yellow Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 4581] (the “First Amended Disclosure Statement”).

3. On November 20, 2024, the Debtors filed the *Second Amended Joint Chapter 11 Plan of Yellow Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 4974] (the “Second Amended Plan”) and the *Second Amended Disclosure Statement for the Second Amended Joint Chapter 11 Plan of Yellow Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 4975] (the “Second Amended Disclosure Statement”).

4. On November 22, 2024, the Court entered the *Order Approving (I) the Adequacy of the Disclosure Statement, (II) the Solicitation and Voting Procedures, (III) the Forms of Ballot and Notices in Connection Therewith, and (IV) Certain Dates with Respect Thereto* [Docket No. 5024] (the “Disclosure Statement Order”).

5. In connection therewith, the Debtors distributed solicitation materials, including a Ballot pursuant to which Holders of Class 5 General Unsecured Claims were to vote to accept or reject the Second Amended Plan. The Official Committee of Unsecured Creditors (the “Committee”) did not support the Second Amended Plan, and submitted a letter advising Holders of Class 5 Claims to vote to reject the Second Amended Plan on January 28, 2025.

6. Accordingly, for the past several weeks, the Debtors and the Committee (collectively, the “Plan Proponents”) have engaged in extensive and arms’ length negotiations with holders of the vast majority of the Debtors’ largest General Unsecured Claims over the terms of a settlement structure that would resolve most of the disputes that remain outstanding in these cases through the implementation of a revised chapter 11 plan.

7. As a result of these negotiations, on March 28, 2025, the Plan Proponents filed the *Third Amended Joint Chapter 11 Plan of Yellow Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code Proposed by the Debtors and the Official Committee of Unsecured Creditors* [Docket No. 5995] (the “Third Amended Plan”) and the *Third Amended Disclosure Statement for the Third Amended Joint Chapter 11 Plan of Yellow Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code Proposed by the Debtors and the Official Committee of Unsecured Creditors* [Docket No. 5996] (the “Third Amended Disclosure Statement”).

8. Attached hereto as **Exhibit A** is a supplemental Disclosure Statement Order (the “Supplemental Disclosure Statement Order”) approving (a) the adequacy of the Third Amended Disclosure Statement, (b) supplemental solicitation and voting procedures, (c) revised forms of ballots and notices in connection therewith, (d) certain dates with respect thereto, and (e) granting related relief.

9. Any objection to the Supplemental Disclosure Statement Order must (a) be in writing; (b) conform to the Bankruptcy Code, Bankruptcy Rules, the Local Rules, and any orders of the Bankruptcy Court; (c) state, with particularity, the basis and nature of any objection to the Supplement Disclosure Statement Order and, if practicable, a proposed modification to the Supplemental Disclosure Statement Order that would resolve such objection; and (d) be filed with the Bankruptcy Court (contemporaneously with a proof of service) and served upon the following notice parties so as to be actually received **by no later than 4:00 p.m. (prevailing Eastern Time) on April 11, 2025**: (i) the Debtors, Yellow Corporation, 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211, Attn.: Yellow Legal (legal@myyellow.com); (ii) counsel to the Debtors (a) Kirkland & Ellis LLP, 333 West Wolf Point Plaza, Chicago, Illinois, 60654, Attn: Patrick J.

Nash Jr., P.C. (patrick.nash@kirkland.com) and Robert Jacobson (rob.jacobson@kirkland.com) and 601 Lexington Avenue, New York, New York 10022, Attn.: Allyson B. Smith (allyson.smith@kirkland.com), and (b) Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17th Floor, PO Box 8705, Wilmington, Delaware 19801, Attn: Laura Davis Jones (ljones@pszjlaw.com), Timothy P. Cairns (tcairns@pszjlaw.com), Peter J. Keane (pkeane@pszjlaw.com), and Edward Corma (ecorma@pszjlaw.com); (iii) counsel to the Creditors' Committee (a) Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, Bank of America Tower, New York, NY 10036-6745 US, Attn: Philip C. Dublin (pdublin@akingump.com), Meredith A. Lahaie (mlahaie@akingump.com), and Kevin Zuzolo (kzuzolo@akingump.com) and (b) Benesch, Friedlander, Coplan, Aronoff LLP, 133 North Market Street, Suite 1201, Wilmington, DE 19801, Attn: Jennifer R. Hoover (jhoover@beneschlaw.com), Kevin M. Capuzzi (kcapuzzi@beneschlaw.com), and John C. Gentile (jgentile@beneschlaw.com); and (iv) the Office of the United States Trustee for the District of Delaware, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801, Attn.: Jane Leamy (jane.m.leafy@usdoj.gov).

10. If an objection is timely filed and not withdrawn or resolved, such objection will be heard at a hearing scheduled by the Plan Proponents, which hearing may be requested on an emergency or expedited basis, or as ordered by the Court.

11. If no objection is timely filed, the Plan Proponents will submit a certification of counsel to request that the Court enter the proposed Supplemental Disclosure Statement Order at the Court's earliest convenience.

Dated: April 4, 2025
Wilmington, Delaware

/s/ Laura Davis Jones

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